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2016 PEC 20 AM 5: 17

Washington, D.C. 20005-3960

December 19, 2016

OFFICE OF GENERAL

Marc E. Elias
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Jeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Re: MUR 7157

Dear Mr. Jordan:

On behalf of the Democratic National Committee ("Respondents"), we submit this letter in response to the complaint filed by Project Veritas Action Fund and James O'Keefe III ("Complainants") on October 20, 2016 (the "Complaint") alleging a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), or Federal Election Commission ("FEC or "Commission") regulations. The Complaint fails to include any facts, which, if proven true, would constitute a violation of the Act. The Commission should accordingly dismiss the Complaint and take no further action.

Factual Background

Complainants claim that Respondents accepted impermissible in-kind contributions "in the form of coordinated expenditures" from a number of third-party organizations. To support these allegations, the Complaint offers an unauthenticated "transcript" of conversations they surreptitiously recorded, involving agents of Americans United for Change ("AUFC") and Democracy Partners. The Complaint provides the Commission with no authenticated, unedited recordings of these conversations that would permit the evaluation of the actual, complete statements in context. Instead, the Complainants devised the questions themselves, cherry-picked excerpts of responses and presented them out of context, and then used these preferred excerpts to frame the instant Complaint.

Relying on this self-generated, spurious "documentation," Complainants then mount a sweeping coordination claim against Respondents. Complainants claim that Respondents were "materially

See 11 C.F.R. § 111.4(d)(3).

² Compl. at 14.

³ Compl. Ex. A.

⁴ See 11 C,F.R. § 111.4(d)(4) (requiring a complaint to "be accompanied by any documentation supporting the facts alleged if such documentation is known of, or available to, the complainant.").

involved in decisions about content, means, and mode of communication," and had "substantial discussion[s]" with third-party organizations, and "participated in weekly calls to determine shared electoral strategy" with third-party organizations. According to the Complaint, those third-party organizations then "engaged in the production of public communications." The Complaint calls this "[o]utside group shared messaging."

Once the Complaint is shorn of its repeated, conclusory allegations, it presents only a handful of specific allegations regarding Respondents, despite its claim of a six-month "undercover" investigation:⁸

- It quotes Americans United for Change's Scott Foval as saying: "So the operation is to insert and get the doc message in there if we can or the extremist message depending on we have to clear this with the DNC." Scott Foval allegedly continued: "With the Democratic National Committee, we have to clear which methods we're going to be targeting at each event but they can insert into multiple events now through the end of the election on a continual on a daily basis but basically do a chase all the way across the country." The Complaint does not say with whom Foval spoke, whether that person actually worked for Respondents, or which activity Foval is even describing and whether the activity ever happened at all.
- It suggests that Respondents "participated in weekly calls to determine shared electoral strategy," while detailing no actual call, and leaving open the question of whether Respondents even participated at all. 11
- It alleges that Respondents coordinated with non-party, non-candidate groups, through the operation of a "Donald Ducks" mascot and related activity. 12

Legal Analysis

The Complaint fails to provide reason to believe that any unlawful coordination occurred. As noted above, the Complaint hinges entirely on spurious videos and transcripts that the Complainants generated themselves and then provided only selectively to the Commission, in apparent contravention of 11 C.F.R. § 111.4(d)(4). Yet even if one were to assume the

⁵ Compl. at 8.

⁶ Compl. at 10.

⁷ Id.

⁸ *Id*. at 4.

⁹ Compl. at 6..

¹⁰ Compl. at 7.

¹¹ Compl. at 10.

¹² Compl. at 9; see also Compl. Ex. B.

documentation's authenticity and completeness, the Complaint would still fail to present a violation by Respondents. It fails to show any nexus between Respondents' conduct and any specific activity for which it did not pay.

Federal law treats a coordinated communication as an in-kind contribution to a campaign. ¹³ Each particular communication must satisfy a three-prong test to be considered a coordinated communication: it must (1) be paid for by a person other than a candidate, authorized committee or political party committee with which it is coordinated; (2) satisfy one or more content standards; and (3) satisfy one of several conduct standards. ¹⁴ Each prong must be satisfied for the communication to be considered coordinated, and thus an in-kind contribution.

Under Commission regulations, the content prong can be satisfied in one of five ways.¹⁵ The first is to be an "electioneering communication," which must be publicly distributed by a television station, radio station, cable television station, or satellite system within 60 days before a general election or 30 days of a primary election.¹⁶ The remaining four ways to satisfy the content prong require the communication be a "public communication," which the Act defines as "a communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public or any other form of general public political advertising."

The Complaint does not identify any communication that would meet the content prong. It claims that Respondents "participated in weekly calls to determine shared electoral strategy" with outside groups, including "discussions about how to shape content and messaging to benefit" Respondents. Labeling this "[o]utside group shared messaging," the Complaint assumes without knowledge or documentation that, "[b]ecause third-party groups engaged in the production of public communications," the content prong is satisfied. 20

However, one cannot tell which "public communication" Complainants are referring to, as they fail to point to any specific activity involving Respondents that constitutes a public communication under the Act. Instead, Complainants cite to ambiguous references in the "transcript" of unspecified political activity by "numerous third-party groups." The Complaint also alludes to plans to "have third-party groups launch protests at political events" without

¹³ See 52 U.S.C § 30101(8)(A); 11 C.F.R § 109.20.

^{14.11} C.F.R. § 109.21.

¹⁵ FEC Matter Under Review 6722 (House Majority PAC), General Counsel's Report at 4 (Aug. 6, 2013) (citing 11 C.F.R. § 109.21(c)(1)-(5)).

¹⁶ See id. (citing 11 C.F.R. §§ 109.21(c)(1), 100.29(a), (b)(1)).

¹⁷ Id. (citing 11 C.F.R. § 109.21(c)(2)-(5)).

¹⁸ 52 U.S.C. § 30101(22); 11 C.F.R. §§ 100.26, 109.21(c).

¹⁹ Compl. at 10.

²⁰ Id.

²¹ Compl. at 7.

naming a specific group that is responsible.²² Because the Complaint alleges no public communication in which Respondents actually participated, there can be no reason to believe that Respondents violated the Act. 23

Similarly, the Complaint presents no facts to show that Respondents met the conduct prong as to any actual communication. It claims repeatedly that a wide range of communications "were directed, controlled or puppeteered by Respondents."²⁴ But this is rank speculation, and the Commission has refused to entertain similarly sweeping conspiracy theories in the past. 25 For example, in MUR 5754, it was not enough for the complaint simply to say that a non-party, noncandidate group "made no secret of its ongoing communications with Democratic party officials."²⁶ Rather, the complaint had to connect the supposed discussions to the alleged coordinated communications, which it did not do.²⁷ Similarly, this Complaint fails to provide any connection between Respondents and any actual "public communication," and so for this reason also, the Commission should find no reason to believe a violation occurred.

The only specific activity that the Complaint alleges that was actually associated with Respondents—the "Donald Ducks" mascot—is one for which Respondents paid in full. Respondents had a contract with Mobilize, Inc., a vendor providing consulting services to Respondents during the 2016 cycle, and Respondents paid that vendor for the expenses associated with that mascot. See Exhibit A (detailing duck-related expenses). Neither the payment prong nor the content prong of the coordination rules was satisfied as to the duck. Respondents know of no expenses associated with any third party regarding the duck, and in any case they had fully paid for all expenses associated with the costuming, staffing and deployment of the duck. Yet even if any additional expenses had been incurred in relation to the duck's

²³ The Commission's Office of General Counsel has consistently recommended dismissal of complaints alleging that communications other than "public communications" sponsored by third parties were illegal contributions. See, e.g., FEC Matter Under Review 6477 (Right Turn USA), First General Counsel's Report (Dec. 27, 2011); FEC Matter Under Review 6522 (Lisa Wilson-Foley for Congress), First General Counsel's Report (Feb. 5, 2013); FEC Matter Under Review 6657 (Akin for Senate), First General Counsel's Report (Sept. 17, 2013); FEC Matter Under Review 6722 (House Majority PAC), First General Counsel's Report (Aug. 6, 2013). In each of these matters, the Commission has unanimously voted to dismiss the complaints. ²⁴ Compl. at 3.

²⁵ See, e.g., FEC Matter Under Review 5754 (MoveOn.org Voter Fund), Factual and Legal Analysis of Alleged Coordination at 3-4.

²⁷ *Id*.

future use, they would not have resulted in a coordinated communication, insofar as the duck did not represent a "public communication" under the Act.²⁸

Conclusion

The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act.²⁹ For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination." Additionally, the Commission has made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are *not* sufficient to find reason to believe that Respondents violated the Act.³¹ Here, Complainants rely exclusively on speculation and unwarranted legal conclusions to allege Respondents have violated the Act. Accordingly, we request the Commission find no reason to believe Respondents committed any violation of the Act and dismiss this matter immediately.

We appreciate the Commission's consideration of this response.

Very truly yours,

Marc E. Elias

Brian G. Svoboda

Courtney Weisman

Counsel to Respondents

²⁸ See 11 C.F.R. §§ 109.21(c)(2), 100.26 (defining "public communication" as a communication made "by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public or any other form of general public political advertising.").

²⁹ 11 C.F.R. § 109.21(a).

³⁰ FEC Matter Under Review 5754, supra note 31.

³¹ FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000).

Exhibit A



Thanks!

Your reservation is confirmed. No need to call to reconfirm.

Fairfield Inn & Suites Wilkes-Barre Scranton, Wilkes-Barre

Oct 10, 2016 - Oct 11, 2016

See live updates to your itinerary, anywhere and anytime.

See your itinerary

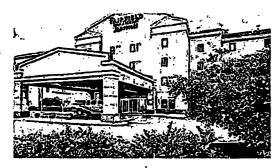
Or get the free app:







Hotel overview



Reservation dates
Oct 10, 2016 - Oct 11, 2016

Itinerary # 7216566802395

Fairfield Inn & Suites Wilkes-Barre Scranton 884 Kidder Street, Wilkes-Barre, PA, 18702 United States of America

View hotel

Map and directions

Check-in and Check-out

TOOTTONING.

noon

Room

3:00PM

Guests

Reserved for Aaron Minter 1 adult

Room

Suite, 1 King Bed

Room requests
1 king bed
Non-smoking room

Included amenities

Continental Breakfast, Free High-Speed Internet

Price summary

Price breakdown Room price: \$154.29 1 night: \$139.00 Taxes & fees: \$15.29

Total \$154.29

Expedia.

402 points for this trip

Collected by Expedia

Unless specified otherwise, rates are quoted in US dollars.

Additional hotel fees

The below fees and deposits only apply if they are not included in your selected room rate.

The price shown above DOES NOT include any applicable hotel service fees, charges for optional incidentals (such as minibar snacks or telephone calls), or regulatory surcharges. The hotel will assess these fees, charges, and surcharges upon check-out.

Rules and restrictions

Cancellations and changes .

We understand that sometimes plans fall through. We do not charge a cancel or change fee. When the hotel charges such fees in accordance with its own policies, the cost will be passed on to you. Fairfield Inn & Suites Wilkes-Barre Scranton charges the

The room type and rate selected are non-refundable. Should you change or cancel this reservation for any reason, your payment will not be refunded.

No refunds will be issued for late check-in or early check-out.

Stay extensions require a new reservation.

Pricing and Payment

Hotel fees

The price above DOES NOT include any applicable hotel service fees, charges for optional incidentals (such as minibar snacks or telephone calls), or regulatory surcharges. The hotel will assess these fees, charges, and surcharges upon check-out.

Pricing

Your credit card is charged the total cost at time of purchase. Prices and room availability are not guaranteed until full payment is received.

Some hotels request that we wait to submit guest names until 7 days prior to check in. In such a case, your hotel room is reserved, but your name is not yet on file with the hotel.

Guest Charges and Room Capacity

Base rate is for 1 guest.

Total maximum number of guests per room/unit is 4.

Maximum number of adults per room/unit is 4.

Maximum number of children per room/unit is 3.

Maximum number of infants per room/unit is 3.

This property considers guests aged 17 and under, at time of travel, to be children.

Availability of accommodation in the same property for extra guests is not guaranteed.

More help

About the Hotel

For special requests or questions about the property, please call the hotel directly at Tel: 1 (570) 208-4455, Fax: 1 (570) 208-4488

About your Reservation

Visit our <u>Customer Support</u> page.
Call us at 1-877-261-3523.
For faster service, mention itinerary #7216566802395

A Member of Democracy Partners 350 W. Hubbard St., Ste. 200 Chicago, IL 60654 Attn. Linda Saucedo

Invoice

Date	Invoice #
9/2/2016	283

Bill To	
Democratic National Committee Attn. Chief Operating Officer 430 S. Capitol Street, SE Washington, DC 20003	•

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
	General Election Consulting Contract - August 2016 Management - \$14,000/month Immigration Consultant - \$8,000/month Rapid Response Consultants 3 @ \$5,000/month/consultant Kelly Benjamin @ \$500 (8/31 Sarasota Event)	37,500.00	37,500.00
	Reimbursements for Month Breakdown: (see attached) Room Rental: Home Plate Diner - Des Moines, IA (8/27/16) Shipping: Fed Ex shipments of Signs (8/29/16) Duck Materials: Pay Pal - Duck Costume (1 of 3) (8/17/16) Harris Costumes - Duck Costume (2 of 3) (8/19/16) Twin Cities Magic & Costume (3 of 3) (8.19/16) AnyPromo - Rubber Ducks (8/26/16) M&I Recording - DJ Quacker Duck Song (8/31/16) Printing: Boruck Printing & Silkscreening - Printing of Signs in Seattle, WA (8/30/16)	3,838.95	3,838.9
	Travel: Southwest Airlines (8/16/16) Delta Airlines (8/18/16) Delta Baggage Fee for Duck Costume (8/18/16) Uber (8/18/16) Uber (8/18/16) American Airlines (8/19/16)	·	
	Services for Month Breakdown: Trump Events (see Page 2)		·
se remit by	wire. Confidential instructions attached.	Total	

Invoice

Mobilize, Inc., NA

A Member of Democracy Partners 350 W. Hubbard St., Ste. 200 Chicago, IL 60654 Attn. Linda Saucedo

Date	Invoice #
9/2/2016	283

Bill To

Democratic National Committee
Attn. Chief Operating Officer
430 S. Capitol Street, SE
Washington, DC 20003

TOOMEST STOCK

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description			Rate		Amount
	Bracketing activities for Following Trump Events:					
	Date -Type of Event - City, State				l	
	8/2/16 -Town Hall/Presser -Ashburn, VA					
	8/2/16 - Pressers - Phoenix & Tuscon, AZ				- 1	
	8/3/16 - Presser/Rally - Jacksonville, FL				- 1	
	8/3/16 -Event - Portland, ME			_		
	8/4/16 -Presser/Protest/Town Hall - Portland, ME		l	•		
•	8/4/16 -Presser/Town Hall -Raleigh, NC		l		- 1	
	8/4/16 - Presser/Rally - Norfolk, VA		[l	
	8/5/16 - Presser/Protest - Greenbay, WI				- 1	
•	8/5/16 -Press Call/Presser/Protest - Des Moines, IA		ŀ			
	8/6/16 - Fundraiser - Nantucket, MA		1			
	8/6/16 - Fundraiser - Oyster Harbors, MA				- 1	
	8/6/16 -Rally - Windham, NH			•		
	8/7/16 -Presser -Detroit, MI		- 1		- 1	
	8/8/16 -Presser/Speech -Detroit, MI					
	8/8/16 -Presser/Fundraiser -Canton, OH				I	
	8/8/16 - Presser - Omaha, NE		1	•	- 1	
	8/8/16 - Event -Council Bluffs, IA				l	
	8/9/16 - Presser -East Lancaster, PA				- 1	
	8/9/16 - Presser - Pittsburgh, PA				1	
	8/9/16 - Presser - Wilmington, NC		l		l	
	8/9/16 - Presser - Fayetteville, NC		i			
	8/10/16 - Presser - Dayton, OH			i		
	8/10/16 -Presser - Columbus, OH					
	8/10/16 - Presser -Abington, VA					
	8/10/16 - Presser/Protest -Ft. Lauderdale, FL					
	8/11/16 - Press Call/Presser -La Crosse, WI					
	8/11/16 -Presser/Protest -Milwaukee, WI			•	.]	
	8/11/16 -Rally -Orlando, FL	•				
	8/12/16 -Presser/Press Call -Erie, PA		ì			
	8/12/16 -Presser -Altoona, PA				Į	
	8/12/16 -Presser -Hartford, CT				- 1	
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	•			Total		

Page 2

A Member of Democracy Partners 350 W. Hubbard St., Ste. 200 Chicago, IL 60654 Attn. Linda Saucedo

Invoice

Date	Invoice #
9/2/2016	283

Bill To	
Democratic National Committee Attn. Chief Operating Officer 430 S. Capitol Street, SE Washington, DC 20003	

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
	8/13/16 -Rally -Fairfield, CT		
	8/15/16 - Presser - Youngstown, OH		
	8/16/16 - Presser/Town Hall - Milwaukee, WI		
	8/16/16 - Presser/Rally -Milwaukee, WI		
	8/16/16 - Presser -La Crosse, WI	.	
	8/17/16 - Presser/Protest -Henderson, NV		
	8/18/16 - "Donald Ducks" -New York, NY		ì
	8/18/16 - Presser/Fundraiser/Rally -Charlotte, NC		
	8/18/16 - Visibility -Manchester, NH		
	8/19/16 -Presser/Rally -Lansing, MI		·
	8/19/16 -Presser/Fundraiser -Minneapolis, MN		
	8/20/16 - Presser/Rally -Fredericksburg, VA		
	8/20/16 - Presser/Canvass - Des Moines, IA		
	8/22/16 - Press Call -Cedar Rapids, IA		
	8/22/16 -Presser -Akron, OH		
	8/23/16 -Presser/Visibility -Fort Worth, TX		
	8/23/16 - Presser/Visibility -Austin, TX		
	8/23/16 - Presser -Chicago, IL	j j	. 1
	8/24/16 -Presser - Jackson, MS		
	8/24/16 -Presser -Tampa, FL		
	8/24/16 -Presser -Charlotte, NC		
	8/24/16 -Presser -Wilmington, NC		
	8/25/16 -Presser -New York, NY	<u> </u>	
	8/25/16 -Press Call/Visibility -Manchester, NH	1	
	8/25/16 -Presser/Visibility -Aspen, CO		
	8/25/16 -Presser -Phoenix, AZ	l l	
	8/26/16 -Protest/Fundraiser -Lake Tahoe, NV	İ	
	8/26/16 -Protest -Las Vegas, NV		
	8/27/16 -Presser/Protest -Purcellville, VA		
	8/27/16 -Presser/Protest -Des Moines, IA		1
	8/28/16 - Presser - San Francisco, CA		
	8/29/16 -Presser - Atlanta, GA	i	
	8/29/16 -Presser -Seattle, WA	J	ļ
	8/30/16 - Story Placed (AJC) -Dalton, GA		
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	•	Total	

Page 3

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A Member of Democracy Partners 350 W. Hubbard St., Ste. 200 Chicago, IL 60654 Attn. Linda Saucedo

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Date	Invoice #	
9/2/2016	283	

Bill To

Democratic National Committee
Attn. Chief Operating Officer
430 S. Capitol Street, SE
Washington, DC 20003

P.O. No. Terms Project

Due on receipt

		 Due on receipt	
Quantity	Description	, Rate	Amount
,	8/30/16 -Presser -Winston-Salem, NC 8/30/16 -Protest/Rally -Everett, WA 8/31/16 -Presser -Phoenix, AZ 8/31/16 -Visibility -Sarasota, FL		
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	·		
ease remit by	wire. Confidential instructions attached.		
		Total	\$41,338.9

Invoice

A Member of Democracy Partners 350 W. Hubbard St., Ste. 200 Chicago, IL 60654 Attn. Linda Saucedo

Date	Invoice #
12/8/2016	305

Bill To	
Democratic National Committee Attn. Chief Operating Officer 430 S. Capitol Street, SE Washington, DC 20003	

P.O. Ńo.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
	Shipping of Bracketing Materials (See UPS Store Receipt)	336.52	. 336.52
	Equipment for Trump Hotel Protest (See Mens Wearhouse Receipts)	353.15	353.15
· .	Round Trip Mileage from Washington, DC to Charlotte, NC (806 miles @ \$0.54 per	435.24	435.24
	mile) - Overnight drive to help launch "Trump Ducks" debut in Charlotte		
ļ	Round Trip Mileage from Washington, DC to Fredericksburg, VA (112 miles @ \$0.54	60.48	60.48
	per mile) - "Trump Ducks" Protest in Fredericksburg	142.06	147.06
	Round Trip Mileage from Washington, DC to Philadelphia, PA (274 miles @ \$0.54 per mile) - Meeting in Philadelphia to discuss labor and grassroots outreach	147.96	147.96
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]	•	Total	\$1,333.35
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December 8th 2016

Mobilize DemocracyPartners 350 W. Hubbard Street, Ste. 200 Chicago, IL 60654

Linda Saucedo.

emailed to: <u>lindasaucedo@democracypartners.com</u>.

Make payment to:

James Salt

Washington DC 20011

North Carolina trip involved driving overnight to help launch. 'Trump Ducks' debut in Charlotte.

Fredericksburg trip involved 'Trump Ducks' protest

Philadelphia trip involved meeting with HFA staff to discuss labor and grassroots outreach

Round Trip Mileage Washington DC to Charlotte NC 806 miles at \$0.54 per mile.	-	435.24
Round Trip Mileage Washington DC to Fredericksburg 112 miles at \$0.54 per mile.		60.48
Round Trip Mileage Washington DC to Philadelphia PA 274 miles at \$0.54 per mile.		147.96
Shipping Costs for Trump Ducks costume to Scot Floval		336.52
Tuxedo Costs for Trump Hotel Protestat		353.15
	Total	1333.35

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we're here turnelp. teres of method from 1394 no relat great utters and resources

www.lheraselorg.com/sieny.



THE MENS WEARHOUSE, INC. 529 14TH STREET NW WASHINGTON, DC 20045 202-783-0128

Consultant: AARON METHENY (AMM152; Date. U9/12/2016

Sold to:

Sale Items

Mdse Code Description Oty Price

408A30410 C. K. BRODIE LA 1 99.99

Price Markdown -50.00

Total Purchase 49.99

Tax 2.87

Total Sales Amount \$52.66

and Total \$52:86

Saved: \$50.00 --

Payments:

Debit Card XX.AXXXXXXXXX 52.86 Date:09.12.2 b Time:01:25:37PM Auth#: 631536

In store credit only after 90 days

See Return/Exchange Policy at: www.membwer house.com/returns

fran Nc: 350u+2+8736 Store No: 3506 Transaction: SALE: Phone: 202-7:3-0128

3506 + 2 + 2 7 3 6

WE INVITE YOU TO VISIT OUR WEBSITE AT:

Thank You



THE MENS WEARHOUSE, INC. 529 14TH STREET NW WASHINGTON, DC 20045 202-783-0128

Consultant: AARON METHER" (AMM152)

Date: 09/12/2016

Sold to:

· · Sale It	ems	• • •	
Mdse Code	Description	Qty	Price
JU0M42310	Puev tux sv ff	1	229.99
502765510	J&F WING TUX	1	49.99
	Price Markdow	n	-20.00
811480002	PR COUT PRE BOW	1	19,99
	Namage Markdow	n	-8.00
002680000	PANT PLAIN BOTTOM	1	12.00
	Total Purchas	ke	283.97
	Ta		16.32
	Total Sales Amour		\$300.29

-- You Saved: \$28.00 --

Sales Amount Grand Total \$300.29

Payments:

In store credit only after 90 days

See Return/Exchange Policy at: www.menswearhouse.com/jeturns

Tran No: 3506*3*7083 Store No: 3506 Transaction: SALE Phone: 202-783-0129



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Thank Yo